IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN STATE OF MISSISSIPPI SOUTHER DIVISION

SHERRY C. TARANTO, et al

PLAINTIFF

VERSUS

CIVIL ACTION NO. 1:08cv1356-LG-RHW

STATE FARM FIRE AND CASUALTY INSURANCE

DEFENDANT

MOTION FOR ADMISSION OF COUNSEL PRO HAC VICE

COMES NOW Darryl M. Gibbs, a member-in-good-standing of the bar of this Court, and pursuant to Local Rule 83.1 (a)(2), respectfully moves the Court for admission of John H. Denenea, Jr. by comity as nonresident attorney, *pro hac vice*. As grounds for said motion, Movant represents onto the Court that:

- 1. As set forth in the affidavit hereto (Exhibit "1"), John H. Denenea, Jr. practices law in Louisiana. He is a member-in-good-standing of the State Bar of Louisiana (Exhibit "2") and the Bars of the Eastern, Middle and Western Districts of Louisiana (Exhibit "3", "4" and "5").
- 2. John H. Denenea, Jr. obtained a Juris Doctor degree from Loyola University School of Law. He was admitted to the Louisiana State Bar in 1988.
- 3. John H. Denenea, Jr. seeks admission *pro hac vice* in this case to represent the Plaintiffs, in association with Darryl M. Gibbs, resident attorney.
- 4. WHEREFORE, PREMISES CONSIDERED, Darryl M. Gibbs respectfully moves the Court, pursuant to Local Rule 83.1 (A)(2), that John H. Denenea, Jr. be admitted *pro hac vice* as a non-resident attorney before the bar of this Court, for the limited purpose of representing Plaintiffs, in connection with the above-referenced civil action.

Respectfully Submitted,

TABOR, CHHABRA & GIBBS, P.A.

By: /s/Darryl M. Gibbs
Darryl M. Gibbs

Darryl M. Gibbs, MS Bar No. 100232 TABOR, CHHABRA & GIBBS, P.A. 120 North Congress Street, Suite 200 Jackson, Mississippi 39201 Telephone: (601) 914-1512 Facsimile: (601) 914-1511

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CERTIFICATE OF SERVICE

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I, the undersigned, Darryl M. Gibbs, Attorney for the Plaintiffs, do hereby certify that I have this day served via electronic means true and correct copy of the above and foregoing to:

James H. Heidelberg, Esq. Jessica M Dupont, Esq. Heidelberg, Steinberger, Colmer & Burrow, P.A. Post Office Box 1407 Pascagoula, Mississippi 39568-1407

THIS the 11th day of September, 2009.

/s/ Darryl M. Gibbs Darryl M. Gibbs